

**REMARKS**

Claims 1, 2, 5 and 9 are all the claims pending in the application.

The Examiner rejects:

- claim 1 under 35 U.S.C. § 112, second paragraph, due to antecedent basis errors;
- claim 1 under 35 U.S.C. § 103(a) as being unpatentable over Applicant's Admitted Prior Art (AAPA) in view of Isley, Jr. et al. (Isley) and IBM Technical Disclosure Bulletin (IBM\_TDB); and
- claims 2, 5 and 9 under 35 U.S.C. § 130(a) as being unpatentable over (AAPA) in view of Isley and IBM\_TDB, and further in view of Thorne, III et al. (Thorne).

Also, the Examiner objects to the specification due to a minor typographical error, and requires that FIG. 2 be labeled as "Prior Art".

With regard to the §112, second paragraph, rejection, Applicant amends claim 1 to address the minor antecedent basis errors noted by the Examiner. This amendment does not change the scope of the original claim 1, and no estoppel is created.

With regard to the objection to the specification, Applicant amends the specification to correct a minor typographical error on page 2, as suggested by the Examiner.

With regard to the drawings, Applicant submits herewith a Proposed Drawing Correction labeling FIG. 2 as "prior art", as required by the Examiner, and correcting a typographical error (not noted by the Examiner) in FIG. 4A.

With regard to the prior art rejections, Applicant respectfully traverses these rejections as follows.

Applicant's invention provides a connection managing method for a digital interface for performing connection management for a plurality of devices connected by a digital interface capable of operating in a private mode. In particular, Applicant's claimed invention provides a unique combination of method steps for performing an operation which selectively controls an external device, including, *inter alia*:

(a) establishing the private mode as an operation mode in a first arbitrary device in response to a user's command;

(b) the first device identifying devices having a right to access related registers to store in itself information relating to the identified devices;

(c) the first device determining whether there is a request for access to the related registers by a third-party device;

(d) determining whether the third-party device is included in the previously stored devices if there is a request;

(e) the first device accepting the request of the third-party device if the third-party device is determined to be included in the devices stored in the step (d); and

(f) the first device returning an error code to the third-party device, which indicates that the first device cannot accept the request, if the third-party device is not determined to be included in the devices stored in the step (d).

(See Applicant's independent claim 1.)

The Examiner acknowledges that AAPA does not teach performing an operation which selectively controls an external device when operating in private mode. In fact, as explained in the "Description of the Related Art" section of Applicant's specification, in the conventional method for managing a digital interface connection, a third-party device can arbitrarily access the existing connection. The Examiner alleges that, Isley and IBM\_TDB supply the acknowledged deficiencies of AAPA. Applicant respectfully disagrees.

AMENDMENT UNDER 37 C.F.R. § 1.111  
Appln. No.: 09/626,078

Isley discloses a mobile terminal, MT, for satellite communication, which has net radio service implemented therein, and is configured for operation in "NORMAL", "PRIVATE" and "PRIORITY 1" mode of operation (see Isley, col. 13, lines 30-33). With regard to "PRIVATE" mode of operation, Isley discloses nothing more than that:

In the PRIVATE mode of operation, the initiating MT user selects which other user it desires to set up a call with. Once the call has been established, a net is created where only the two authorized users tuned to the same net channel are able to communicate with one another (Id., col. 3, lines 23-28; see also Id., col. 13, lines 35-40).

Nowhere does Isley disclose or suggest that its MT, or any device, is capable of identifying devices having a right to access related registers to store in itself information relating to the identified devices, as required by Applicant's claim 1. In fact, while Isley proposes to create a net where only the two users tuned to the same channel are able to communicate with one another, nowhere does Isley disclose or suggest how to prevent a third user from arbitrarily accessing such a net, so that the privacy of the two users tuned to the same channel can be protected. That is, Isley does not disclose, and is incapable of suggesting:

(c) the first device determining whether there is a request for access to the related registers by a third-party device;

(d) determining whether the third-party device is included in the previously stored devices if there is a request;

(e) the first device accepting the request of the third-party device if the third-party device is determined to be included in the devices stored in the step (d); and

AMENDMENT UNDER 37 C.F.R. § 1.111

Appln. No.: 09/626,078

(f) the first device returning an error code to the third-party device, which indicates that the first device cannot accept the request, if the third-party device is not determined to be included in the devices stored in the step (d),  
as required by Applicant's claim 1.

On the other hand, IBM\_TDB discloses nothing more than a conventional remote logon procedure where users at remote terminals issue logon command in order to establish connection with a central (host) system. Nowhere does AAPA or Isley suggest that that "logon" procedure for establishing communication with a central system, as provided by IBM\_TDM, is to be implemented in two-way communication between mobile terminals. In fact, IBM\_TDB's conventional logon procedure (see Id, Fig. 2) has nothing to do with, and does not in any way suggest, establishing a private mode as an operation mode in a first arbitrary device in response to a user's command, the first device identifying devices having a right to access related registers to store in itself information relating to the identified devices in order to establish private communication between two users, as required by Applicant's claim 1. In particular, telecommunication between users and a central (host) system via a logon procedure as disclosed by IBM\_TDM does not in any way suggest establishing private connection between two of such users, let alone teach or suggest a method for preventing a third user from arbitrarily accessing the connection between two such users.

Finally, Thorne has nothing to do with managing connections between digital devices, and is cited by the Examiner for nothing more than the disclosure of a method for selective display of information (see Office Action, page 6). Thus, Thorne does not in any way supply the above-noted deficiencies of AAPA, Isley and IBM\_TDM.

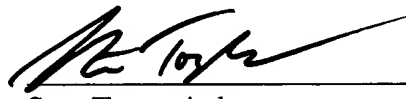
AMENDMENT UNDER 37 C.F.R. § 1.111  
Appln. No.: 09/626,078

Therefore, Applicant's independent claim 1, as well as its dependent claims 2, 5 and 9 (which incorporate all the novel and unobvious features of their base claim), would not have been obvious from any reasonable combination of AAPA, Isley, IBM\_TDM and Thorne, at least for the reasons set forth above.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
Stan Torgovitsky  
Registration No. 43,958

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE



23373

PATENT TRADEMARK OFFICE

Date: June 16, 2003